

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of)
)
Wireless E911 Location Accuracy Requirements) PS Docket No. 07-
114
)
Revision of the Commission's Rules to Ensure) CC Docket No. 94-
102
Compatibility with Enhanced 911 Emergency)
Calling Systems)
)
Association of Public-Safety Communications)
Officials-International, Inc. Request for)
Declaratory Ruling)
)
911 Requirements for IP-Enabled Service Providers)
WC Docket NO. 05-196

COMMENTS OF APCO Tier 1 Member, John Miceli

I. INTRODUCTION

John Miceli has over 30 years experience in law enforcement and is the former Chief of the Tyngsboro Police Department, Tyngsboro, Ma. He provides these comments regarding the above captioned matters addressed in the Notice of Proposed Rulemaking, FCC 07-108, adopted by the Commission on May 31, 2007 in his individual capacity and as a Tier 1 member of APCO. These comments are not intended to represent the views of the Tyngsboro Police Department or the Town of Tyngsboro, Ma.

II. SUMMARY OF COMMENTS: N/A

III. DISCUSSION

A) In the event of an emergency, E911 location information must be

precise enough to lead first responders close enough to the caller to be within line of sight. Not to do so, endangers both the caller in need of assistance as well as the emergency personnel responding to the scene who put their lives at risk en route. Any system that misleads, delays or distracts emergency personnel from these vital directions is of little value to anyone. Of course, the FCC should apply the E911 accuracy standards to the PSAP level. What public safety minded observer could advocate otherwise?

B) Wasn't the distance of 150 meters (and 50 meters) originally determined to be the margin within which emergency responders could be confident of locating an E911 caller?

Weren't the compliance percentages associated with these distances themselves a matter of debate and discussion with the affected carriers when first adopted in 2000?

Didn't the FCC announce it would "strictly enforce" the E911 public safety requirements when it granted a five year extension of the carrier compliance date to January 1, 2006?

C) Didn't the carriers know immediately when they originally tested the gpsOne receiver provided by Qualcomm that its performance was greatly affected in urban canyons?

Why didn't the carriers force Qualcomm to either improve the performance/accuracy of its GPS receiver or substitute it for any of the other better performing GPS receivers that have been available in the market for years? Was it because better protecting the public would have meant increasing the price of subsidized handsets?

IV. CONCLUSION

In an era where emergency services are publicly measured by the average number of minutes it takes to reach a victim, the primary emergency communications system must provide the most precise, local information to guide responders to a wireless caller in distress. This is a life and death issue. There must be an

affirmative duty on every carrier to continually improve their compliance with the accuracy requirements until they meet or exceed whatever standard is established.

Public emergency services professionals are most equipped to determine the range of accuracy necessary to best serve the public safety. APCO has effectively made the case for the current standards to be applied at the PSAP level. There is an important corollary obligation on the carriers to aggressively identify, test and deploy any technology that might materially improve their ability to support an emergency response. Carrier inaction over the past seven years should lead us all to question whether these companies have given this critical public responsibility a priority over shareholder concerns. It is up to the FCC to create the atmosphere, oversight and disciplinary tools necessary to insure that both emergency services and the carriers are vigilant in meeting their obligations to the E911 caller.

I urge the FCC to adopt APCO's recommendation to apply the accuracy standards at the PSAP level. I am convinced this will save many lives. And should the carriers be granted an additional period to become compliant it is just as important, that the Commission put in place immediately a system to ensure that the carriers are aggressively identifying, testing and deploying any technology that might bring them into compliance as soon as possible. Such a monitoring/disciplinary system will also undoubtedly enhance public safety and save lives.

Respectfully Submitted,

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